

THANKSUNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: FAIRFIELD SENTRY LIMITED, et al., Debtor in Foreign Proceedings.	Chapter 15 Case Case No. 10-13164 (CGM) Jointly Administered
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. THEODOOR GGC AMSTERDAM, et al., Defendants.	Adv. Pro. No. 10-03496 (CGM) Administratively Consolidated
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. HSBC SECURITIES SERVICES (LUXEMBOURG) S.A., et al., Defendants.	Adv. Pro. No. 10-03630 (CGM)
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. ABN AMRO SCHWEIZ AG, et al., Defendants.	Adv. Pro. No. 10-03635 (CGM)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

ABN AMRO SCHWEIZ AG, et al.,

Defendants.

Adv. Pro. No. 10-03636 (CGM)

DECLARATION OF YELENA KONANOVA
IN SUPPORT OF THE LIQUIDATORS' MOTION TO FILE UNDER SEAL CERTAIN
EXHIBITS TO THE DECLARATION OF DAVID ELSBERG

I, YELENA KONANOVA, do hereby declare, under penalty of perjury under the laws of the United States of America, that the following is true and correct to the best of my knowledge and belief:

1. I am a member of the law firm of Selendy & Gay PLLC, counsel for Kenneth Krys and Greig Mitchell (together, the "Liquidators" or "Foreign Representatives"), in their capacities as the duly appointed Liquidators and Foreign Representatives of Fairfield Sentry Limited (In Liquidation), Fairfield Sigma Limited (In Liquidation), and Fairfield Lambda Limited (In Liquidation). I submit this Declaration in support of the Liquidators' Motion to File Under Seal Certain Exhibits to the July 26, 2021 Declaration of David Elsberg in Support of the Liquidators' Opposition to Defendants' Motions to Dismiss for Insufficient Service of Process (the "Sealing Motion"), filed contemporaneously herewith.

2. Attached as Exhibit A is a redacted copy of the facsimile communication from Citco Bank Nederland N.V. to Liechtensteinische Landesbank AG Reinvest AMS dated September 24, 2010, which was produced to the Liquidators by Liechtensteinische Landesbank (sued as Liechtensteinische LB Reinvest AMS) ("LLB") as LLB000027–36. LLB has redacted the names of its employees based on counsel for LLB's understanding that those names are protected under

the EU General Data Protection Regulation (“GDPR”) and Liechtenstein’s Data Protection Act (“LDPA”). An unredacted version of the exhibit is being hand delivered to the Clerk’s Office, consistent with Local Bankruptcy Rule 9018-1.

3. Attached as Exhibit B is a redacted copy of the e-mail from LGT Bank in Liechtenstein AG’s (“LGT Bank”) employees to outside counsel dated September 21, 2010, which was produced to the Liquidators by LGT Bank as LGT00028. LGT Bank has redacted the names of its employees based on counsel for LGT Bank’s understanding that those names are protected under the GDPR and LDPA. An unredacted version of the exhibit is being hand delivered to the Clerk’s Office, consistent with Local Bankruptcy Rule 9018-1.

4. Attached as Exhibit C is a draft order granting the Sealing Motion. A copy of that draft order has also been submitted to eOrders, consistent with Chambers’ Rules.

Dated: New York, New York
July 26, 2021



YELENA KONANOVA